

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF TIMOTHY H.
DELLIT IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO STAY
PRELIMINARY INJUNCTION
PENDING APPEAL

NOTE ON MOTION CALENDAR:
August 25, 2025

DECLARATION OF TIMOTHY H. DELLIT IN
SUPPORT OF PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO STAY
PRELIMINARY INJUNCTION PENDING
APPEAL
NO. 2:25-cv-00244-LK

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
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1 I, Timothy H. Dellit, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and attest to
3 the information set forth below through personal knowledge as well as through University of
4 Washington (UW) personnel who have assisted me in gathering this information from our
5 institution.

6 2. I am the CEO of UW Medicine and the Dean of the UW School of Medicine. UW
7 Medicine is an integrated clinical, research and learning health system with a single mission to
8 improve the health of the public. The UW School of Medicine is a leader in regional medical
9 education and conducts world-leading research across 31 clinical and biomedical research
10 departments and multiple research institutes and centers.

11 3. This declaration incorporates and supplements my declarations dated February 5,
12 2025 (Dkt. #16) and February 19, 2025 (Dkt. # 174).

13 4. This Court's Preliminary Injunction Order limiting the ability of federal agencies
14 to immediately and haphazardly impose new conditions on federal research grant recipients
15 pursuant to the Executive Orders titled "Defending Women From Gender Ideology Extremism
16 And Restoring Biological Truth To The Federal Government" (EO 14168) and "Protecting
17 Children from Chemical and Surgical Mutilation" (EO 14187) have provided significant relief
18 to UW School of Medicine. This Court protection has allowed UW Medicine to continue
19 operating consistent with its core missions, including advancing research and the public health,
20 while this lawsuit proceeds.

21 5. One of UW Medicine's primary missions is medical research. Medical research
22 can improve the life of all people, improve the public health, and restore hope to those facing
23 serious health conditions. UW Medicine has one of the largest medical research programs of any
24 institution globally. As I previously testified, UW has more than 1,000+ researchers working on
25 medical research grants through many federal agencies including: Department of Agriculture,
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1 Department of Commerce, Department of Defense, Department of Education, Department of
2 Energy, Department of Health and Human Services, Department of Veterans Affairs, National
3 Aeronautics & Space Administration, National Science Foundation, and Office of the Director
4 of National Intelligence.

5 6. In federal fiscal year 2024, UW School of Medicine received \$494 million in
6 federal medical research grants.

7 7. Federal medical research grants have enabled UW School of Medicine faculty to
8 make incredible medical advances and breakthroughs, including on Alzheimer's disease,
9 muscular dystrophy, traumatic brain injuries, spinal cord injuries, autism, kidney disease, and
10 many more. UW School of Medicine depends upon the availability of the federal medical
11 research grants it has been awarded to continue its groundbreaking medical research that benefit
12 everyone.

13 8. The ability of UW School of Medicine to achieve its educational, research, and
14 health care mission would be significantly impaired if it were suddenly stripped of its federal
15 medical research grants under EO 14168 and/or EO 14187.

16 9. Prior to the Temporary Restraining Orders and then Preliminary Injunction
17 Orders entered by this Court and the district court in Maryland, the federal government was
18 issuing grant terminations under EO 14168 and EO 14187.

19 10. For instance, on January 31, 2025, the Health Resources and Services
20 Administration (HRSA) advised UW School of Medicine researchers that "[e]ffective
21 immediately, HRSA grant funds may not be used for activities that do not align with Executive
22 Orders (E.O.) entitled *Ending Radical and Wasteful Government DEI Programs and*
23 *Preferencing, Initial Rescissions of Harmful Executive Orders and Action, Protecting Children*
24 *from Chemical and Surgical Mutilation, and Defending Women from Gender Ideology*
25 *Extremism and Restoring Biological Truth to the Federal Government,*" and "[a]ny vestige,
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1 remnant, or re-named piece of any programs in conflict with these E.O.s are terminated in whole
2 or in part.”

3 11. A similar message was sent to UW School of Medicine researchers by the Centers
4 for Disease Control (CDC) on January 31, 2025, which advised grant recipients that “[t]o
5 implement the Executive Order entitled *Defending Women From Gender Ideology Extremism*
6 *And Restoring Biological Truth To The Federal Government* . . . you must immediately
7 terminate, to the maximum extent, all programs, personnel, activities, or contracts promoting or
8 inculcating gender ideology at every level and activity . . . that are supported with funds from
9 this award,” and that “[a]ny vestige, remnant, or re-named piece of any gender ideology
10 programs funded by the U.S. government under this award are immediately, completely, and
11 permanently terminated.”

12 12. While both of those messages were later rescinded, these abrupt and disruptive
13 emails from different federal agencies created a climate of chaos for our researchers. Following
14 this Court’s Preliminary Injunction Order, UW School of Medicine has not received any grant
15 terminations pursuant to EOs 14168 or 14187. This has helped provide stability and consistency
16 to our medical researchers who are currently working on federal medical research grants
17 involving a wide range of critical public health issues including cancer, diabetes, liver disease,
18 cardiovascular disease, asthma, opioid use disorder, Down Syndrome, and organ transplantation.
19 Some of these research studies are long term, lasting many years, such that disruption or abrupt
20 cancellation of these grant-funded studies would quite literally throw away years of research and
21 progress toward scientific advances and possible medical breakthroughs.

22 13. This Court’s Preliminary Injunction Order has also enabled UW to stay true to its
23 public health mission. As I previously testified, ceasing to provide health care to treat gender
24 dysphoria would undermine UW Medicine’s mission and its ethical duties to its patients and to
25 the community that it serves. At the same time, UW School of Medicine receives hundreds of
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1 millions of dollars in federal research grants that are also critical to UW's public health mission.
 2 This Court's Preliminary Injunction Order has ensured that UW School of Medicine would not
 3 be stripped of critical federal research grants simply because it provides lawful healthcare
 4 services, consistent with the standards of care, to underserved populations in Washington State.

5 14. UW Medicine physicians practice in a health care ecosystem that is broader than
 6 UW Medicine itself. Our physicians routinely receive referrals from, and refer patients to,
 7 providers both inside and outside UW Medicine's system of hospitals and clinics. For instance,
 8 Seattle Children's Hospital serves as the pediatric referral center for the Pacific Northwest
 9 providing excellent pediatric care to meet the medical, surgical and developmental needs of
 10 children in the WWAMI region (Washington, Wyoming, Alaska, Montana, and Idaho). As it
 11 relates to minor and young-adult patients including those with gender dysphoria, this can include
 12 referrals to physicians and clinicians at Seattle Children's Hospital, mental health providers in
 13 their communities, and many others statewide. If the Court were to limit its injunction to only
 14 those institutions operated directly by Washington State itself, that would ignore the
 15 interconnected nature of medical and therapeutic care, especially for complex or ongoing
 16 conditions, that our care teams provide.

17 15. Further, Seattle Children's Hospital serves as the primary teaching, clinical and
 18 research site for the Department of Pediatrics at the University of Washington School of
 19 Medicine. In the context of gender-affirming care, this ensures that UW Pediatric residents
 20 receive top-notch training and clinical experience in treating adolescents with gender dysphoria.
 21 If Seattle Children's Hospital felt forced by the federal government to cease providing this care,
 22 this would directly impact the education and clinical experience of UW School of Medicine's
 23 pediatric faculty, fellows, and residents.

24 16. Finally, if this Court were to stay its Preliminary Injunction Order, UW School
 25 of Medicine expects the chaos from earlier this year to resume, with researchers once again
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1 having their medical research grants terminated midstream pursuant to EOs 14168 or 14187. Or
 2 worse, the federal government could begin stripping *all* federal research grants from medical
 3 institutions that provide gender-affirming care pursuant to Section 4 of EO 14187.

4 17. Such chaos harms not only the educational, research, and health care missions of
 5 the UW School of Medicine, but also public health. If federal research grant funding to UW
 6 School of Medicine is suddenly frozen or ended, key research projects would be left unfinished,
 7 putting future medical treatments and breakthroughs at risk of not being developed or
 8 discovered.

9 18. The alternative choice is to stop providing gender-affirming care to treat gender-
 10 dysphoria in our adolescent patients in response to the EOs. But the provision of safe, high-
 11 quality health care centered on patients and families is at the core of UW Medicine's mission.
 12 Denying medically-indicated health care to patients as a result of the EOs would irreparably
 13 harm UW School of Medicine's public health and patient-care missions.

14 I declare under penalty of perjury under the laws of the State of Washington and the
 15 United States of America that the foregoing is true and correct.

16 DATED this __15th__ day of August 2025 at Seattle, Washington.

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19 _____
 20 TIMOTHY H. DELLIT, MD
 21 CEO, UW Medicine
 22 Executive Vice President for Medical Affairs,
 23 University of Washington
 24 Paul G. Ramsey Endowed Dean, University of
 25 Washington School of Medicine
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